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September 12, 2012

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VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: Application For Sale and Transfer of Certificate of Public Convenience and
Necessity for Operation of Motor Vehicle Carrier from Boineau's Moving &
Storage, Inc. to Coleman American Moving Services, Inc.

Dear Ms. Boyd:

On behalf of Coleman American Moving Services, Inc., enclosed for filing are the
following:

- 1) the Application for Sale and Transfer of Certificate of Public Convenience and
Necessity for Operation of Motor Vehicle Carrier from Boineau's Moving and
Storage, Inc. to Coleman American Moving Services, Inc., including Exhibits A-K
referenced within the Application;
- 2) a copy of the Asset Purchase Agreement by and among Boineau's Moving and
Storage, Inc. and Coleman World Group, LLC (Exhibit L);
- 3) a copy of the Assignment transferring all rights and liabilities of Coleman World
Group, LLC arising out of said Asset Purchase Agreement to Coleman American
Moving Services, Inc. (Exhibit M);
- 4) copies of bills of lading from Boineau's Moving and Storage, Inc. dated April 1, 2011
and March 14, 2012, demonstrating that services have been continuously offered and
reasonably provided to the public by the transferor for not less than twelve months
prior to the date of the application (Exhibit N);

(continued)

- 5) copies of prior Certificates of Public Convenience and Necessity for the Operation of Motor Vehicle Carriers (Class E) of Boineau's Moving and Storage, Inc. dated January 10, 1945, August 22, 1945, November 26, 1947, May 26, 1949, March 19, 1991, and May 12, 1997 demonstrating the transferor's significant experience and knowledge with regard to the transportation of household goods (Exhibit O); and
- 6) a company description and history of Coleman American Moving Services, Inc. (Exhibit P).

Further, we request that the Commission waive both the notice and hearing requirements with regard to the Application. Both the transferor and transferee have significant experience in the transportation of household goods, including safety requirements. Moreover, as noted above, the transferor has held a Class E Certificate in South Carolina since 1945 and bills of lading attached to the Application demonstrate that services have been continuously offered and reasonably provided to the public for not less than twelve months prior to the date of the Application. Furthermore, other than the owners, the employees, including drivers, warehouse personnel and others involved in day to day operations will remain with the transferee. In addition, the transferee will retain all assets and equipment of the transferor, a list of which is included with the Application. Accordingly, it is our position that the transferee has aptly demonstrated that it is fit, willing and able to provide this service to the public via the information in the verified application and therefore no notice or public hearing is necessary. Therefore, based upon the foregoing, S.C. Code Ann. § 58-23-340, and the rules and regulations of the Commission, we respectfully request that the Commission approve this application based upon the verified Application filed herewith.

Should you have any questions or require further documentation, please do not hesitate to contact us.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.


Mitchell Willoughby

MW/cgc
enclosure

cc: Ms. Katheryn M. Grigsby (w/enclosure)
Mr. Jeff Nelson, Esquire (w/enclosure)